

# **EXHIBIT C**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

ACCURIDE ERIE, L.P.

Plaintiff/Counterclaim Defendant,

v.

INTERNATIONAL UNION, UNITED  
AUTOMOBILE, AEROSPACE, AND  
AGRICULTURAL IMPLEMENT  
WORKERS OF AMERICA, LOCAL 1186

Defendant/Counterclaim Plaintiff.

Civil Action No. 05-CV-00169

Judge Sean J. McLaughlin

Bonita Little, being duly sworn, states as follows:

1. I am an adult resident of the State of Pennsylvania. I have personal knowledge of, and am competent to testify regarding, the matters contained in this Affidavit.

2. I am a Human Resources Administrator for Accuride Erie, L.P. ("Accuride" or the "Company"). As an Administrator, I am responsible for assisting with the administration of human resources policies and procedures at Accuride's manufacturing plant in Erie Pennsylvania. I am also responsible for assisting with the administration of employee compensation and benefits policies. I explain benefits policies and assist employees at the Erie Plant in understanding and using the benefits that are available to them. I also enroll Erie Plant employees in benefits policies that are available to them, including medical benefits policies.

3. In February 2008, I spoke with six employees who had been notified that they were being given an opportunity to enroll in the Company's employee medical plan. They were: Gary Irish; Dan Percy; Gary Wilson; John Harmich; John Loeslein; and Larry Zielinski. These employees previously were considered ineligible for employee medical benefits because of elections they signed when they became Accuride employees. The employees had been requested to notify the Company by February 29, 2008, if they desired to enroll in the employee

medical plan. I called each of the employees on the phone prior to February 29 to inquire whether they intended to enroll in the employee medical plan.

4. Gary Irish and Dan Percy were the only employees of the six who requested to enroll in the employee medical plan in February 2008. I completed the enrollment applications for each of them, and they signed the applications in early March. Each was covered by Accuride's employee medical plan effective March 1, and they continue to be covered.

5. The other employees I spoke with said they did not want to enroll. They that they were currently participating in a medical plan sponsored by their former employer, Kaiser, that they preferred. For instance, when I spoke with John Loeslein on the phone about whether he intended to enroll in the Company's medical plan, he said the Kaiser plan he was participating in was better than Accuride's employee medical plan. He said that he had been experiencing some medical issues recently and he was only paying \$20 for prescriptions and \$15 for office visits. He also said that while he had to make payments to continue his Kaiser coverage, there was a federal government program through the Internal Revenue Service that was reimbursing him for those payments. He said that Accuride's plan would not be as good as what he currently has with the Kaiser coverage. Therefore, he elected not to enroll.

6. My conversations with the other employees were similar. When I spoke with Gary Wilson on the phone about whether he would enroll, he simply said he did not want to enroll in Accuride's employee medical plan. He said he preferred his current Kaiser coverage.

7. Larry Zielinski also told me during our telephone conversation that he preferred his current Kaiser coverage. Later, on about May 27, 2008, Zielinski called me again and said he changed his mind about Accuride's medical coverage. Zielinski said several times "they dropped me." I asked who did? Zielinski said "Kaiser." He didn't specifically say why Kaiser

terminated his medical coverage. Zielinski is 71 years old, and is Medicare eligible. I thought that Kaiser may have terminated his medical coverage when Zielinski became Medicare eligible. I asked Zielinski whether he had applied for Medicare, and he said he did, but that he didn't understand how to use his Medicare benefits. He seemed confused. He said he now wanted to enroll in Accuride's medical plan. Subsequently, I investigated whether Zielinski could be enrolled in the medical plan and was told that he could be. Accuride's medical plan does not exclude anyone from coverage because they are Medicare eligible. Therefore, I contacted Zielinski again and told him that he will be enrolled in the Accuride medical plan.

8. I also spoke with John Harmich about whether he planned to enroll in the employee medical plan. Harmich said he preferred to keep his Kaiser medical plan coverage. He also said that he planned to retire effective April 1, so it didn't make sense for him to enroll in Accuride's plan for one month. Harmich asked me whether he could take retiree medical coverage from Accuride and I said no, the enrollment opportunity is only for employee medical benefits.

Bonita Little  
Bonita Little

Sherryl A. Jordano  
Notary Public

My Commission Expires: 6/21/08

Sworn to and subscribed before me  
this 5 day of June, 2008

